

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

VIVIAN FARRIS; trustee for)	
WIRT ADAMS YERGER, JR. LEGACY)	
TRUST; <i>Individually and on behalf of</i>)	
<i>all those similarly situated</i>)	Civil Action No. 1:17-cv-417
)	
Plaintiff,)	Hon. Matthew W. McFarland
)	
v.)	
)	
U.S. FINANCIAL LIFE INSURANCE)	
COMPANY,)	
)	
Defendant.)	

**PLAINTIFF’S MOTION FOR ATTORNEYS’ FEES, EXPENSES, AND SERVICE
AWARDS TO THE CLASS REPRESENTATIVE**

Pursuant to Federal Rule of Civil Procedure Rule 23(h) and subject to Court approval, Plaintiff Vivian Farris (as trustee for the Wirt Adams Yerger, Jr. Legacy Trust), individually and on behalf of the proposed Settlement Class, respectfully submits motion for attorneys’ fee, expenses, and service awards to the class representative. For the reasons detailed in Plaintiff’s supporting memorandum, Plaintiff respectfully requests the Court award from the Common Settlement Fund: Class Counsel a fee of \$4,600,000; reimbursement of \$371,572.77 in reasonable expenses and costs; and \$15,000 to Plaintiff for her service as class representative. Defendant U.S. Financial Life Insurance Company does not take a position on this Motion.

Respectfully submitted, this the 11th day of October, 2021:

/s/ W. Daniel “Dee” Miles, III
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CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2021, a true and correct copy of the foregoing was served via CM/ECF to all counsel of record:

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